



# Memorandum

**Date:** March 8, 2011

**To:** Supervisor Michael D. Antonovich, Mayor  
Supervisor Gloria Molina  
Supervisor Mark Ridley-Thomas  
Supervisor Zev Yaroslavsky  
Supervisor Don Knabe

**From:** Stephen R. Maguin *SR Maguin*  
Chief Engineer and General Manager

**Subject:** **Response to SCOPE Letter and Testimony to the Board of Supervisors Regarding Formation of the Newhall Ranch Sanitation District (January 18, 2011 Board Agenda Item 25)**

On January 18, 2011, the Board of Supervisors (Board) approved a motion by Supervisor Antonovich directing the Sanitation Districts (Districts) to prepare a memorandum that responds to the issues raised by the testimony of Ms. Lynne Plambeck and Ms. Cam Noltemeyer of the Santa Clarita Organization for Planning and the Environment (SCOPE), and the letter from Ms. Plambeck dated January 13, 2011 (both documents are attached with issues numbered).

The memorandum presents background information on the proposed Newhall Ranch Development and the prior actions by the County and the Districts that provide context for the issues raised. SCOPE's issues are shown in bold followed by the Districts' response.

## **I. Background**

On March 23, 1999, and, again, on May 27, 2003, the Board certified the environmental documents (collectively, Newhall Ranch EIR) for the Newhall Ranch Specific Plan and Newhall Ranch Water Reclamation Plant (NRWRP). The certified Newhall Ranch EIR evaluated the NRWRP at a project level of detail, and the Board approved the NRWRP under Conditional Use Permit No. 94-087-(5). The NRWRP is to provide treatment of the wastewater generated within the Specific Plan area as well as produce recycled water for the Specific Plan area.

The environmental analysis of the NRWRP is found in Section 5.0 of the Newhall Ranch Revised Draft EIR (March 8, 1999) and Section 3.0 of the Newhall Ranch Revised Additional Analysis, Volume VIII (May 2003). Section 3.0 assessed and updated various NRWRP alternatives including the approved NRWRP site.

The Newhall Ranch EIR contained a mitigation measure (Mitigation Measure 5.0-52), also reflected in the adopted Mitigation Monitoring Plan, requiring formation of a county sanitation district for the Specific Plan area. To fulfill mitigation requirements and establish a logical plan for development of the new district and its infrastructure, the Newhall Land and Farming Company (NLFC) and Sanitation Districts Nos. 26 and 32, later consolidated as Santa Clarita Valley Sanitation District (SCVSD), entered into an agreement (Interconnection Agreement) dated January 9, 2002.

On December 13, 2005, the Board adopted the resolution of intent to form the county sanitation district to be known as the Newhall Ranch County Sanitation District (NRSD). The Board also approved an Addendum to the Newhall Ranch EIR and Additional Analysis, which evaluated the environmental effects of NRSD formation. The Addendum determined that formation of the NRSD would not result in new or substantially more severe environmental impacts than those discussed in the prior Newhall Ranch environmental documents.

Thereafter, the County initiated proceedings for the formation of the NRSD, pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. On June 14, 2006, the Local Agency Formation Commission (LAFCO) for Los Angeles County adopted a resolution approving formation of the NRSD. On July 27, 2006, LAFCO issued a Certificate of Completion for formation of the NRSD.

On January 18, 2011, the Board considered a resolution confirming formation of the NRSD within the scope of the previously certified Newhall Ranch EIR and Addendum. At the January 18, 2011 Board meeting, representatives from SCOPE expressed their concerns by oral testimony and a letter.

## **II. Districts' Responses to SCOPE's Issues**

- 1. "Without the construction of the Sanitation plant as required by the Newhall Ranch Specific Plan, the public will bear the burden of the expensive clean up of chlorides required to comply with the Clean Water Act. This will entail a sharp increase in sewer fees to the general public."**

Discharge of Newhall Ranch wastewater to the Valencia Water Reclamation Plant (VWRP) would be temporary until construction of the Newhall Ranch Water Reclamation Plant (NRWRP). The Newhall Ranch wastewater would neither add nor alleviate the SCVSD's financial burden to comply with the Upper Santa Clara River Chloride Total Maximum Daily load (Chloride TMDL).

The Interconnection Agreement sets conditions under which the first 6,000 homes in Newhall Ranch may temporarily discharge wastewater to the VWRP. The conditions include payment of the standard SCVSD connection fee (fair share of the cost of the existing infrastructure) and transfer of title of the 22-acre NRWRP site to the NRSD. Newhall Ranch residents also would pay the SCVSD an annual service charge to recover the full cost of treating their wastewater at the VWRP. Temporary treatment of wastewater at the VWRP would not eliminate the need for the developer to construct the NRWRP. Prior to building more than 6,000 homes, the developer must construct the NRWRP.

When operating at flows equal to or below the permitted plant capacity, compliance with the Chloride TMDL will depend on the chloride concentration in the treatment plant effluent. This concentration results from two primary sources: chloride concentration of the local water supply, and increased chloride concentration due to use of the water by the community. Local groundwater is the planned potable water source for the Specific Plan's Landmark and Mission Villages, the two developments whose wastewater might be temporarily treated at the VWRP under the Interconnection Agreement. The groundwater chloride levels for those communities are similar to that of the groundwater used by existing Santa Clarita Valley communities. Thus, no difference in chloride concentration is expected due to the water supply.

Like Santa Clarita, Newhall Ranch will be a mixture of residential, commercial and industrial land uses. Use of automatic water softeners (AWS) was a significant chloride source for SCVSD wastewater prior to the 2008 ban on AWS. Per Specific Plan mitigation measure 5.0-52(b), the Newhall Ranch developer must request that NRSD ban AWS in Newhall Ranch. Districts' staff will also recommend that NRSD enact an AWS ban similar to the ban in the SCVSD. Consequently, the two communities are expected to produce similar increases in chloride concentrations due to use and similar overall wastewater chloride concentrations. Since final compliance will be determined by concentration, the addition of Newhall Ranch wastewater to the VWRP would neither add to nor alleviate the SCVSD's financial burden to comply with the Chloride TMDL.

- 2. "...In addition, the agreement between the Santa Clarita Valley Sanitation District of Los Angeles County (SCV) and Newhall Land and Farming allows up to 6,000 capacity units to be treated at existing SCV wastewater treatment facilities as needed during construction of the Newhall Ranch Water Reclamation Plant. SCV has sufficient capacity to accommodate the use of its facilities." This statement cannot be made because the County is currently in the middle of analyzing the impacts for the first tract maps of Newhall Ranch. No certified EIR exists on either the Landmark tract or the Mission Village**

**tract, which comprise approximately 6,000 units. Further, there is not even a Development Monitoring System analysis for sewer capacity included in the Mission Village EIR as required by the Court Decision in 2003.”**

Certification of an EIR is not required to estimate future flows and determine whether there is available capacity at existing treatment facilities. The 2003 Court Ruling by Judge Randall (Case Number S-1500-CV-239324, RDR) does not specify any requirements regarding a Development Monitoring System (DMS) analysis.

Wastewater flow projections for the two Newhall Ranch communities have been reviewed by the Districts. Estimates are 0.3 million gallons per day (mgd) for Landmark Village and 1.0 mgd for Mission Village (collectively 1.3 mgd). The Interconnection Agreement allows for temporary treatment at VWRP for up to 6,000 homes (about 1.6 mgd). The VWRP treated approximately 15 mgd in 2010 and currently has a capacity of 21.6 mgd (yielding 6.6 mgd of surplus capacity). Thus, the VWRP has sufficient capacity to accommodate the temporary use of its facilities as stated in the staff report for the January 18, 2011 Board agenda item. CEQA for the VWRP was addressed by the certified 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and EIR, which examined the environmental impacts of treating 27.6 mgd of wastewater at the VWRP.

The Newhall Ranch EIRs, certified by the Board in 1999 and 2003, evaluated the environmental impacts related to development of the Specific Plan, including construction of the NRWRP and the new sewage facilities to serve the Specific Plan area. At the project level, the County is in the process of completing further CEQA analysis for both Landmark Village and Mission Village. The CEQA compliance for Landmark Village is contained in the Landmark Village Draft EIR (November 2006), Final EIR (November 2007), and Recirculated Draft EIR (January 2010). CEQA compliance for Mission Village is contained in the Mission Village Draft EIR (October 2010). The EIRs contain a County DMS analysis and evaluate each project's wastewater conveyance/disposal effects including temporary wastewater treatment at the VWRP.

3. **“If the Sanitation Plant is not built in accordance with the mitigation requirements of the Newhall Ranch Specific Plan, the Plan cannot meet its requirements to provide non-potable water or to finance its own infrastructure expansion costs.”**

Temporary use of the VWRP for treatment of Newhall Ranch wastewater does not eliminate the Specific Plan requirement for the developer to construct the NRWRP and finance the new sewerage system. The temporary use of the VWRP addresses practical engineering considerations such as the need to build-up an adequate and steady flow of wastewater before start-up of the NRWRP. Whether Newhall Ranch wastewater is treated at the NRWRP or VWRP, the treated wastewater will be suitable for reuse and offsetting Newhall Ranch water demands.

4. **“Further, the Sanitation discharge permit granted by the Regional Water Quality Board required reverse osmosis treatment for the effluent from this plant. By attempting to evade this requirement, Newhall will put the added burden of removing salts from the Newhall Ranch effluent on the backs of the public.”**

Temporary use of the VWRP for treatment of Landmark Village and Mission Village wastewater does not eliminate the requirement for the developer to construct the NRWRP or finance the new sewerage system within the Specific Plan area. The developer must construct the NRWRP per the Specific Plan and must have it operating properly before the next phase after Landmark Village and Mission Village. As noted in the Item 1 response, temporary treatment of Landmark Village and Mission Village wastewater at the VWRP would neither add to nor alleviate the SCVSD's financial burden to comply with the Chloride TMDL.

Temporarily treating wastewater from the first 6,000 Newhall Ranch homes at the VWRP is a practical engineering decision based on the need to build up an adequate, steady flow of wastewater before starting up

the NRWPR, especially the reverse osmosis units. Such an approach would match the slower pace of the development but would not eliminate the Specific Plan requirement for construction of the NRWPR.

5. **“The Santa Clarita Sanitation District’s failure to meet the Clean Water TMDL standard for chloride of 100 mg/l in the Santa Clara River is a result in part due to the sharp and continuing increase in the use of imported State Water Project (SWP) water as seen by the chart below, (also supplied by the Sanitation Districts). This problem is aggravated by high levels of chlorides in the wells proposed to be used for these tracts, according to information found in both the Landmark and Mission Village DEIRs as indicated in the chart below. Therefore, if Newhall uses the Valencia treatment plant rather than building their own Sanitation Plant as required by the Specific Plan, the chloride levels in the effluent of that treatment plant will be substantially increased. Without the immediate construction of the Newhall Ranch Water Reclamation Plant, approved as an RO (reverse osmosis salt removal system) facility, the high chlorides in the wells proposed to be used by this project in the chart below and the additional imported Nickels water will add to this load.”**

Imported water did not cause the chloride standard to be exceeded. Effluent from the VWRP has exceeded 100 mgd/l since the 1970s despite the fact that imported water was not delivered to Santa Clarita Valley until the 1980s. Nonetheless, as noted in the Item 1 response, the chloride concentrations of Newhall Ranch and SCVSD wastewater are expected to be similar. Thus, temporary treatment of Newhall Ranch wastewater at the VWRP would not change the SCVSD’s ability to comply with the Chloride TMDL.

SCOPE implies that use of Nickel water<sup>1</sup> would contribute to increase the chloride load at the VWRP. While the Landmark Village and Mission Village projects are part of the potable water system for the entire Specific Plan, the projects do not rely on Nickel water to satisfy their potable water demands. As reported in the Newhall Ranch Revised Additional Analysis, Section 2.5, Water Resources (Volume VIII, May 2003), the Nickel water would only be needed in years when the Newhall Ranch agricultural water has been used, which is estimated to occur after approximately the 21<sup>st</sup> year of project construction. Therefore, the comment regarding use of Nickel water is not appropriate at this time.

6. **“How does a side agreement between the developer and the Sanitation Districts fit into the planning oversight purview of the Board of Supervisors? How can the Planning Department substantiate that sewer service complies with the County Development Monitoring System or is consistent with the general plan or specific plans if developers make side agreements with the Sanitation Districts?”**

Formation of a new sanitation district was identified in the Specific Plan EIR as a mitigation measure. The Interconnection Agreement was developed to fulfill this Specific Plan requirement and establish a logical plan for the development and administration of the new district and its infrastructure. This agreement ensures that the developer provides the necessary land and infrastructure. The Interconnection Agreement was considered and approved by the Sanitation Districts Nos. 26 and 32 Boards at their January 9, 2002 meetings, which were open to the public. Further, this agreement was referenced in previous County and LAFCO resolutions supporting formation of the new sanitation district.

As noted in the Item 2 response, the EIRs for both Landmark Village and Mission Village contain County DMS analysis. Moreover, the Newhall Ranch developer is required to build a new sewerage system to serve Newhall Ranch developments and, thus, the Specific Plan does not rely upon existing County sewerage facilities. The Districts and County have coordinated their efforts with regard to establishment of the new sanitation district and its sewerage conveyance system. This coordination enables the County to verify that the development is consistent with the County’s General Plan and Specific Plan requirements.

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<sup>1</sup> Nickel water refers to a source of potable water owned by NLFC that can be delivered to the Newhall Ranch development to supplement existing sources of potable water.

7. **“The agreement between the developer of the Newhall Ranch Project and the Sanitation District violates the conditions of the Newhall Ranch Specific Plan and puts the Santa Clarita Valley in jeopardy of continued non-compliance with the Clean Water Act Chloride TMDL. We therefore strongly object to this agreement and ask that the Board of Supervisors take action to rectify this issue.”**

The Interconnection Agreement is not in conflict with the Specific Plan and does not impact the SCVSD's ability to comply with the Chloride TMDL. As noted in the Item 1 and 4 responses, temporary treatment of Landmark Village and Mission Village wastewater at the VWRP would not eliminate the need for the developer to construct the NRWRP and to finance the new sewerage system, nor would it impact compliance with the Chloride TMDL. As presented in the Item 2 response, the VWRP has available capacity for temporary treatment of Landmark Village and Mission Village wastewater. Thus, no negative impact to the SCVSD's sewerage system is expected, and this approach does not conflict with the Specific Plan's requirement for construction of the NRWRP.

8. **“The public should not have to pay the costs of bringing the chloride level into compliance with an increase to their sewer fees.”**

By law, the users of the SCVSD's wastewater system must pay for Chloride TMDL compliance. As noted in the Item 1 and 4 responses, temporary treatment of Newhall Ranch wastewater would neither add to nor alleviate the SCVSD's financial burden to comply with the Chloride TMDL.

9. **“...but for the statement within the resolution that says that “The first 6,000 units of Newhall Ranch will be put through the Valencia Treatment Plant.” That's not consistent with the Newhall Ranch that was passed for the formation of this, the Newhall Ranch sanitation plant.”**

The temporary treatment of Landmark Village and Mission Village wastewater at VWRP does not conflict with Specific Plan's requirements as described in the Item 4 and 7 responses.

10. **“And we ask that that be struck from the staff report because it seems to be a backdoor way of getting those approved when there's no E.I.R. on that and it's not consistent with the Specific Plan.”**

As noted in the Item 4 and 7 responses, temporary treatment of Landmark Village and Mission Village wastewater at the VWRP is not in conflict with the Specific Plan. Prior CEQA compliance was not required because temporary treatment at the VWRP was not proposed until the release of the Draft EIRs for both Landmark Village and Mission Village. Draft EIRs for both projects, including the Landmark Village Recirculated Draft EIR, have been the subject of extensive public review and comment as part of the County's environmental review process.

As stated in the Item 2 response, the environmental implications of the build-out of the VWRP to its capacity were assessed in the SCVSD's certified EIR for the 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan. The Newhall Ranch EIR, evaluated the environmental impacts related to development of the Specific Plan, including construction of the NRWRP to a project level and the new sewerage facilities at a programmatic level to serve the Specific Plan. The County is in the process of completing further CEQA compliance at a project level for both Landmark Village and Mission Village.

11. **“The addendum itself that ... was passed ... for the formation on the Sanitation District specifically says that the wastewater treatment plant will be built in stages as the specific plan area is developed and will ultimately be sized to treat up to 6.8 million gallons. So it, too, is not consistent with what is being said in the Staff Report. So we wonder how the Sanitation District would have made an agreement like that that's in violation of your environmental documents and the Specific Plan.”**

There is no inconsistency between the Staff Report and the Specific Plan. The fact that the Staff Report only addressed the temporary treatment of Newhall Ranch wastewater at the VWRP does not eliminate the Specific

Plan requirement for the developer to build the NRWPR and other sewerage infrastructure to serve the Specific Plan. For more information regarding consistency with the Specific Plan, see the Item 6 response. Regarding claims of violating CEQA, please see the Item 10 response.

12. **“Now we appear before you, and Newhall Land is claiming that they have this agreement with the Sanitation -- actually Santa Clarita Valley Sanitation District of Los Angeles County to allow these 6,000 units to be treated in our existing Santa Clarita wastewater facilities. Those facilities are not reverse osmosis plants. And if this is allowed, it will only create additional problem as far as the chlorides for our community. The reverse osmosis plant that is required with this Newhall Treatment Plant that will take care of chlorides. So definitely, they shouldn’t be allowed to use any other treatment plant.”**

Discharge of Landmark Village and Mission Village wastewater to the VWRP will be temporary until construction and startup of the NRWPR. The Landmark Village and Mission Village wastewater would neither add to nor alleviate the SCVSD’s financial burden to comply with the Chloride TMDL. For further explanation, see the Item 1 and 4 responses.

13. **“And it’s a very, very expensive issue for our community. And we were promised that we would not be funding anything for the Newhall Ranch.”**

Temporary treatment of Landmark Village and Mission Village wastewater at the VWRP would neither add to nor alleviate the SCVSD’s financial burden to comply with the Chloride TMDL as explained in the Item 1 and 4 responses.

14. **“And if that’s what they're going to do, they have to have additional environmental analysis on it.”**

As noted in the Item 10 response, the EIRs for both Landmark Village and Mission Village evaluate wastewater disposal options including temporary treatment of Landmark Village and Mission Village wastewater at the VWRP. There will be no temporary treatment at the VWRP, unless and until the Board has considered and certified the project EIRs in accordance with CEQA.

Should you have any questions or concerns, please contact me, or Mr. Thomas J. LeBrun at (562) 908-4288, extension 2751 or via email at [tlebrun@lacsds.org](mailto:tlebrun@lacsds.org).

cc: Board of Directors – Santa Clarita Valley Sanitation District  
Department of Public Works  
Regional Planning Commission

SRM:TJL:ddg



## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
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Telephone: (562) 699-7411, FAX: (562) 699-5422  
[www.lacsd.org](http://www.lacsd.org)

STEPHEN R. MAGUIN  
*Chief Engineer and General Manager*

March 8, 2011

Board of Directors  
Santa Clarita Valley Sanitation District  
of Los Angeles County

Directors:

**Memorandum to Board of Supervisors – Newhall Ranch Sanitation District**

Enclosed is the memorandum requested by the Board of Supervisors regarding formation of the Newhall Ranch Sanitation District and responses to the issues raised by the Santa Clarita Organization for Planning and the Environment.

Please contact me should you have any questions.

Very truly yours,

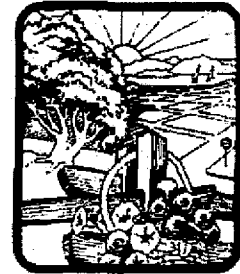
Stephen R. Maguin

SRM:TJL:ddg

Enclosure

DOC # 1800048

**SCOPE**  
**Santa Clarita Organization for Planning and the Environment**  
TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY  
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY  
POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



1-13-11

Attn: Executive Office  
LA County Board of Supervisors  
500 W. Temple St.  
Los Angeles, CA 90012

Re: Agenda Item # 25 -- Inconsistency with Newhall Ranch Specific Plan  
*Please copy to all Supervisors*

Dear Sirs:

It has come to our attention that, while the staff report for this agenda item correctly states the timeline of the formation of the Newhall Ranch Sanitation District, it also includes erroneous information and brings to light an agreement made between the Sanitation Districts and Newhall Land and Farming that is inconsistent with the Newhall Ranch Specific Plan. Further, it misinforms the Board as to the financial impacts of such an agreement.

We ask that the Supervisors, and particularly Mr. Antonovich, as our representative on the Board of Sanitation District 26 and 32, immediately investigate and set aside this agreement. We request that Board of Supervisors, as ultimate oversight authority for the approval and conformity of the Newhall Ranch Specific Plan, object to this agreement between the Newhall Land Co. and the Sanitation Districts. We request that the Board delay approval of this agenda item until this investigation is completed and the staff report is corrected.

We particularly object to these two sections of the staff report:

1. **"FISCAL IMPACT/FINANCING**

It is anticipated that the operation and maintenance of the District and its facilities would be funded through the imposition of service charges, which would be collected on the tax roll, and construction of the facilities would be financed by the developer for the Newhall Ranch project."

1 | Without the construction of the Sanitation plant as required by the Newhall Ranch Specific Plan, the public will bear the burden of the expensive clean up of chlorides required to comply with the Clean Water Act. This will entail a sharp increase in sewer fees to the general public.

2. **"IMPACT ON CURRENT SERVICES (OR PROJECTS)**

2 | This project will not have an adverse impact on current sewage services because the District will build facilities to serve all new developments within the Newhall Ranch Specific Plan area. In addition, the agreement between the Santa Clarita Valley Sanitation District of Los Angeles County (SCV) and Newhall Land and



Farming allows up to 6,000 capacity units to be treated at existing SCV wastewater treatment facilities as needed during construction of the Newhall Ranch Water Reclamation Plant. SCV has sufficient capacity to accommodate the use of its facilities."

2 This statement cannot be made because the County is currently in the middle of analyzing the impacts for the first tract maps of Newhall Ranch. No certified EIR exists on either the Landmark tract or the Mission Village tract, which comprise approximately 6000 units. Further, there is not even a Development Monitoring System analysis for sewer capacity included in the Mission Village EIR as required by the Court Decision in 2003.

### **Background**

The Mitigation Monitoring Plan of the Newhall Ranch Specific Plan states that:

**SP 4.11-1** The proposed Specific Plan **SHALL**<sup>1</sup> implement a water reclamation plant in order to reduce to specific plan's demand for imported potable water, The Specific Plan **SHALL** install a distribution system to deliver non-potable reclaimed water to irrigate land uses suitable to accept reclaimed water, pursuant to the Los Angeles County Department of Health Standards. **Mitigation 4.11-8** requires Newhall to pay for the cost of water expansion by paying for connection fees and **Mitigation 4.12-7** ensured the public would not have to pay for the development of Newhall Ranch by requiring that future tracts would have to be annexed into a sewer district.

**SP 4.12-2** A 5.8 to 6.9 mgd water reclamation plant **SHALL** be constructed on the Specific Plan site, pursuant to County, State, and Federal design standards, to serve the Newhall Ranch Specific Plan.

**SP 4-12-3** A Conceptual Backbone Sewer Plan **SHALL** be implemented pursuant to County, state and federal design standards.

Please note: The mitigation monitoring system does NOT say "may", it says, "SHALL".

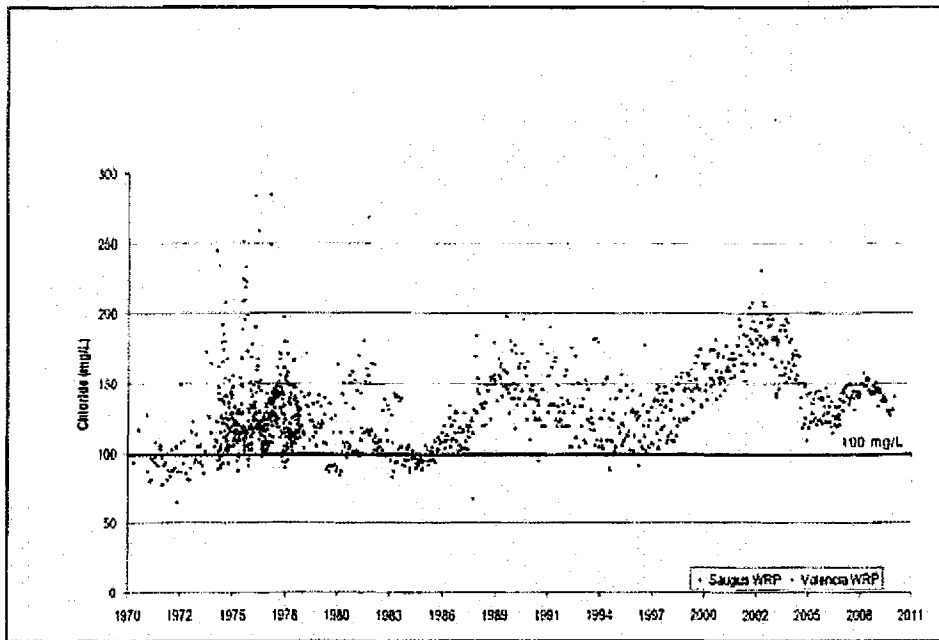
3 If the Sanitation Plant is not built in accordance with the mitigation requirements of the Newhall Ranch Specific Plan, the Plan cannot meet its requirements to provide non-potable water or to finance its own infrastructure expansion costs.

4 Further, the Sanitation discharge permit granted by the Regional Water Quality Board required reverse osmosis treatment for the effluent from this plant. By attempting to evade this requirement, Newhall will put the added burden of removing salts from the Newhall Ranch effluent on the backs of the public.

### **The CHLORIDE issue**

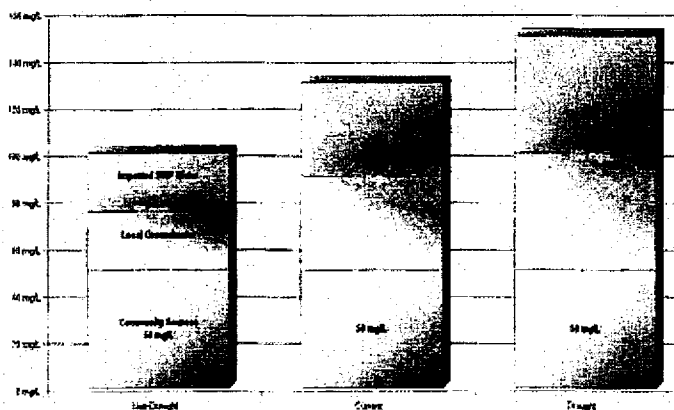
Currently the Sanitation Districts 26 and 32 in the Santa Clarita Valley do not comply with the Clean Water Act Act Total Maximum Daily Load (TMDL) effluent standard of 100 ugl for Chloride as indicated by the chart below supplied at a recent Sanitation District public hearing:

<sup>1</sup> Emphasis added to all "shall's" in this section



The Santa Clarita Sanitation Districts' failure to meet the Clean Water TMDL standard for chloride of 100mg/l in the Santa Clara River is a result in part due to the sharp and continuing increase in the use of imported State Water Project (SWP) water as seen by the chart below, (also supplied by the Sanitation Districts).

#### Chloride Sources During Drought & Non-Drought Conditions



This problem is aggravated by high levels of chlorides in the well proposed to be used for these tracts, according to information found in both the Landmark and Mission Village DEIRs as indicated in the chart below. Therefore, if Newhall uses the Valencia treatment plant rather than building their own Sanitation Plant as required by the Specific Plan, the chloride levels in the effluent of that treatment plant will be substantially increased. Without the immediate construction of the Newhall Ranch Water Reclamation Plant, approved as an RO (reverse

osmosis salt removal system) facility, the high chlorides in the wells proposed to be used by this project in the chart below and the additional imported Nickels water will add to this load.

**Water Quality Constituents of Concern**  
**Secondary Standards:**  
 (from Mission Village DEIR Appendix F4.8)

Parameter	MCL	DLR	Units	E-14	E-15	E-16	E-17
Chloride	250-500-600	NA	mg/L	75	88	89	74
pH	8.5 - 8.5	NA	units	7.5	7.7	7.3	7.4
Specific Conductance (E.C.)	900-1600-2200	NA	umho/cm	1240	1280	1390	1360
Sulfate	250-500-600	0.5	mg/L	340	330	340	340
Total Dissolved Solids (TDS)	500-1000-1500	NA	mg/L	900	890	950	950

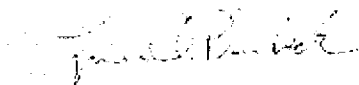
**Conclusion and Questions**

6 | How does a side agreement between the developer and the Sanitation Districts fit into the planning oversight purview of the Board of Supervisors? How can the Planning Department substantiate that sewer service complies with the County Development Monitoring System or is consistent with the general plan or specific plans if developers make side agreements with the Sanitation Districts?

7 | The agreement between the developer of the Newhall Ranch Project and the Sanitation District violates the conditions of the Newhall Ranch Specific Plan and puts the Santa Clarita Valley in jeopardy of continued non-compliance with the Clean Water Act Chloride TMDL. We therefore strongly object to this agreement and ask that the Board of Supervisors take action to rectify this issue.

8 | The public should not have to pay the costs of bringing the chloride level into compliance with an increase to their sewer fees. Thank you in advance for addressing these issues.

Sincerely,



Lynne Plambeck  
 President

**The Meeting Transcript of  
The Los Angeles County Board of Supervisors**



1    **LYNNE PLAMBECK:** GOOD AFTERNOON. WHO WOULD YOU LIKE TO START?  
2    OKAY. MY NAME IS LYNN PLAMBECK, AND I'M HERE REPRESENTING  
3    SANTA CLARITA ORGANIZATION FOR PLANNING AND THE ENVIRONMENT.  
4    AND WE'RE CONCERNED ABOUT THIS AGENDA ITEM NOT FOR THE  
5    RESOLUTION ITSELF, WHICH IS PERFECTLY CORRECT, BUT FOR THE  
6    STATEMENT WITHIN THE RESOLUTION THAT SAYS THAT "THE FIRST  
7    6,000 UNITS OF NEWHALL RANCH WILL BE PUT THROUGH THE VALENCIA  
8    TREATMENT PLANT." THAT'S NOT CONSISTENT WITH THE NEWHALL RANCH  
9    THAT WAS PASSED FOR THE FORMATION OF THIS, THE NEWHALL RANCH  
10    SANITATION PLANT. THE NEWHALL RANCH SANITATION PLANT IS  
11    SUPPOSED TO BE A REVERSE OSMOSIS PLANT, WHICH WILL HELP HANDLE  
12    THE CHLORIDE PROBLEM WHICH MAYOR ANTONOVICH, I KNOW YOU'RE  
13    WELL AWARE OF, AS YOU SIT ON OUR SANITATION DISTRICT AND HAD  
14    TO GO THROUGH ALL THOSE HEARINGS. SO OUR OBJECTION IS NOT TO  
15    THE RESOLUTION ITSELF, BUT TO THE FACT IN THE STAFF REPORT  
16    THAT SAYS THOSE FIRST 6,000 UNITS WILL GO THROUGH THE EXISTING  
17    VALENCIA TREATMENT PLANT, OR UP TO 6,000 UNITS. AND WE ASK  
18    THAT THAT BE STRUCK FROM THE STAFF REPORT BECAUSE IT SEEMS TO  
19    BE A BACKDOOR WAY OF GETTING THOSE APPROVED WHEN THERE'S NO  
20    E.I.R. ON THAT AND IT'S NOT CONSISTENT WITH THE SPECIFIC PLAN.  
21    THE ADDENDUM ITSELF THAT WAS PASSED FOR THE FORMATION IN 2005  
22    AT L.A.F.C.O. FOR THE FORMATION OF THE SANITATION DISTRICT  
23    SPECIFICALLY SAYS THAT THE WASTEWATER TREATMENT PLANT WILL BE  
24    BUILT IN STAGES AS THE SPECIFIC PLAN AREA IS DEVELOPED AND  
25    WILL ULTIMATELY BE SIZED TO TREAT UP TO 6.8 MILLION GALLONS.



**The Meeting Transcript of  
The Los Angeles County Board of Supervisors**



11

1 SO IT, TOO, IS NOT CONSISTENT WITH WHAT IS BEING SAID IN THE  
2 STAFF REPORT. SO WE WONDER HOW THE SANITATION DISTRICT WOULD  
3 HAVE MADE AN AGREEMENT LIKE THAT THAT'S IN VIOLATION OF YOUR  
4 ENVIRONMENTAL DOCUMENTS AND THE SPECIFIC PLAN. SO WE ASK YOU  
5 TO INVESTIGATE THAT. AND THEN FURTHER WE ASK THAT THIS  
6 INFORMATION THAT 6,000 UNITS IS GOING TO GO THROUGH THE  
7 VALENCIA TREATMENT PLANT BE STRUCK FROM THE STAFF REPORT.  
8 BECAUSE THE NEXT THING THAT WILL HAPPEN IS IT WILL SHOW UP IN  
9 THE TRACT MAPS AS THOUGH YOU HAD APPROVED IT. WE DID SEND  
10 LETTERS TO EACH SUPERVISOR'S OFFICE. WE'D LIKE TO RESUBMIT  
11 THOSE LETTERS AT THIS TIME. THANK YOU. ONLY ENOUGH FOR THE  
12 SUPERVISORS. I'M SORRY I DIDN'T PROVIDE IT FOR YOU. THAT'S ALL  
13 I HAVE TO SAY, EVEN THOUGH I HAVE 35 SECONDS LEFT.

14

15 **SUP. ANTONOVICH, MAYOR:** THANK YOU, LYNNE, GOOD JOKE.

16

17 **CAM NOLTEMEYER:** MY NAME IS CAM NOLTEMEYER, ALSO SPEAKING FOR  
18 SANTA CLARITA ORGANIZATION FOR PLANNING AND THE ENVIRONMENT.  
19 MAYOR ANTONOVICH, I KNOW YOU WERE AT A MEETING IN SANTA  
20 CLARITA ALONG WITH A COUPLE OF OUR COUNCIL MEMBERS WITH REGARD  
21 TO THE SANITATION DISTRICT TRYING TO PUT UPON THE TAXPAYERS  
22 250 MILLION TO 500 MILLION FOR THE COST OF A REVERSE OSMOSIS  
23 TREATMENT PLANT TO REMOVE CHLORIDES TO MEET THE CLEAN WATER  
24 STANDARD. BECAUSE OF THAT, THERE WAS A LOT OF PUBLIC PROTEST,  
25 AND THAT MEETING DECISION HAS BEEN POSTPONED. AT THAT TIME,

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1 THEY NOT ONLY WERE OBJECTING TO THE COST OF 250 TO 500  
2 MILLION, BUT THEY WERE ALSO CONCERNED ABOUT THE FACT THAT THEY  
3 WERE FUNDING THE SANITATION DISTRICT FOR NEWHALL RANCH. AT  
4 THAT TIME, THE SANITATION DISTRICT MADE IT VERY CLEAR THAT  
5 THAT WOULDN'T HAPPEN. NOW WE APPEAR BEFORE YOU, AND NEWHALL  
6 LAND IS CLAIMING THAT THEY HAVE THIS AGREEMENT WITH THE  
7 SANITATION -- ACTUALLY SANTA CLARITA VALLEY SANITATION  
8 DISTRICT OF LOS ANGELES COUNTY TO ALLOW THESE 6,000 UNITS TO  
9 BE TREATED IN OUR EXISTING SANTA CLARITA WASTEWATER  
10 FACILITIES. THOSE FACILITIES ARE NOT REVERSE OSMOSIS PLANTS.  
11 AND IF THIS IS ALLOWED, IT WILL ONLY CREATE ADDITIONAL PROBLEM  
12 AS FAR AS THE CHLORIDES FOR OUR COMMUNITY. THE REVERSE OSMOSIS  
13 PLANT THAT IS REQUIRED WITH THIS NEWHALL TREATMENT PLANT, THAT  
14 WILL TAKE CARE OF CHLORIDES. SO DEFINITELY, THEY SHOULDN'T BE  
15 ALLOWED TO USE ANY OTHER TREATMENT PLANT. THEY CAN BUILD THIS  
16 PLANT, AND IT'S QUITE CLEAR IN THE DOCUMENTS WE HAVE HERE THAT  
17 THEY CAN BUILD THAT IN STAGES IN THE SAME WAY THEY ARE  
18 PLANNING TO BUILD THE HOUSES IN STAGES. SO WE DEFINITELY ARE  
19 OBJECTING TO ANY IDEA OF 6,000 UNITS OF NEWHALL RANCH BEING  
20 ALLOWED TO USE THE CURRENT SANITATION FACILITIES BECAUSE OF  
21 THE CHLORIDE ISSUE. AND IT'S A VERY, VERY EXPENSIVE ISSUE FOR  
22 OUR COMMUNITY. AND WE WERE PROMISED THAT WE WOULD NOT BE  
23 FUNDING ANYTHING FOR THE NEWHALL RANCH. I HAVE 31 SECONDS, BUT  
24 THAT IS ALL I HAVE FOR TODAY, THANK YOU.



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14 | 1 **LYNNE PLAMBECK:** AND IF THAT'S WHAT THEY'RE GOING TO DO, THEY  
2 HAVE TO HAVE ADDITIONAL ENVIRONMENTAL ANALYSIS ON IT.

3

4 **SUP. ANTONOVICH, MAYOR:** OKAY.

5

6 **MARK DILLON:** MARK DILLON. GOOD AFTERNOON, SUPERVISORS. HERE  
7 SIMPLY TO SUPPORT YOUR STAFF AND THE ACTION HERE TODAY THAT IS  
8 BEFORE YOU. AND IF THERE ARE ANY QUESTIONS, I'M HERE TO ANSWER  
9 THOSE.

10

11 **SUP. ANTONOVICH, MAYOR:** OKAY, THANK YOU. THANK YOU. LET ME ASK  
12 DEPARTMENT OF PUBLIC WORKS? COULD YOU RESPOND TO THE NUMBER OF  
13 ISSUES THAT HAVE BEEN RAISED RELATIVE TO THIS PROPOSAL?

14

15 **SPEAKER:** TOM LE BRUN WITH THE SANITATION DISTRICT IS HERE WITH  
16 ME. HE MAY BE ABLE TO ANSWER THE QUESTIONS REGARDING THE  
17 CONCERNS REGARDING THE 6,000 UNITS.

18

19 **TOM LEBRUN:** THE SANTA CLARITA VALLEY BOARD APPROVED AN  
20 AGREEMENT WITH NEWHALL LAND AND FARMING IN 2002 WHICH ALLOWED  
21 UP TO 6,000 OF THE FIRST HOMES OF THE NEWHALL RANCH  
22 DEVELOPMENT TO GO THROUGH THE VALENCIA W.R.P. BUT IT REQUIRES  
23 THE NEWHALL COMPANY TO PAY THE SAME RATES THAT ANY OTHER  
24 DEVELOPER WOULD HAVE IN SANTA CLARITA SANITATION DISTRICT,  
25 THAT BEING A CONNECTIONS FEE TO BUY INTO THE EXISTING SYSTEM,

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1 AND THEN AN ANNUAL PAYMENT FOR THE COST TO OPERATE AND TREAT  
2 THE 6,000, THE WASTE FROM THE 6,000 HOMES. SO THAT AGREEMENT  
3 PREDATED SOME OF THE OTHER AGREEMENTS AND ACTIONS THAT THE  
4 BOARD AND L.A.F.C.O. HAVE TAKEN PREVIOUSLY. AND I THINK THAT  
5 WAS THE ONE QUESTION ABOUT WOULD THERE BE FUNDING BY SANTA  
6 CLARITA VALLEY RESIDENTS FOR NEWHALL RANCH? THE ANSWER IS NO.  
7 NEWHALL LAND AND FARMING WOULD HAVE TO PAY, JUST LIKE ANY  
8 OTHER DEVELOPMENT, TO USE THE VALENCIA W.R.P. I DON'T KNOW IF  
9 THERE WAS ANY OTHER SPECIFIC QUESTIONS ON --

10

11 **SUP. ANTONOVICH, MAYOR:** SO WHO PAYS FOR THE -- WHEN IT HAS TO  
12 BE ENLARGED, WHO PAYS FOR IT?

13

14 **TOM LE BRUN:** WHEN THE VALENCIA PLANT WOULD BE ENLARGED --

15

16 **SUP. ANTONOVICH, MAYOR:** THE NEW PROPOSAL, THE NEW DEVELOPMENT,  
17 IS THAT GOING TO HAVE A BUILT-IN FEE FOR EXPANSION OF THAT  
18 UNIT?

19

20 **TOM LE BRUN:** THE 6,000 HOMES WOULD USE UP SOME AVAILABLE  
21 CAPACITY IN SANTA CLARITA VALLEY. THIS IS A TEMPORARY  
22 ARRANGEMENT UNTIL THE NEWHALL RANCH W.R.P. IS CONSTRUCTED.  
23 THAT WOULD BE PAID FOR BY NEWHALL LAND AND FARMING. AND THEN  
24 THE FLOWS WOULD, INSTEAD OF BEING PUMPED TO VALENCIA, WOULD  
25 FLOW BY GRAVITY TO THE NEW TREATMENT PLANT AT THE COUNTY LINE.



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1

2 **SUP. ANTONOVICH, MAYOR:** SO THEIR ADDITION IS NOT GOING TO  
3 MAXIMIZE THE CAPACITY, IT'S GOING TO USE EXISTING RESERVE  
4 CAPACITY SO WE DON'T HAVE TO BUILD A FUTURE ONE?

5

6 **TOM LE BRUN:** THAT IS CORRECT.

7

8 **SUP. ANTONOVICH, MAYOR:** AND THEY'RE GOING TO PAY A FEE TO USE  
9 THE EXISTING FACILITY WHILE THE NEW ONE'S BEING CONSTRUCTED?

10

11 **TOM LE BRUN:** THAT IS CORRECT.

12

13 **SUP. ANTONOVICH, MAYOR:** AND THE EXISTING FEE WILL PAY FOR ALL  
14 MAINTENANCE?

15

16 **TOM LE BRUN:** YES.

17

18 **SUP. ANTONOVICH, MAYOR:** IT WILL COVER THE MAINTENANCE.

19

20 **TOM LE BRUN:** THEY WILL PAY A FEE TO CONNECT, WHICH IS THE SAME  
21 THAT ANY DEVELOPER WOULD PAY ANYWHERE IN SANTA CLARITA VALLEY  
22 SANITATION DISTRICT, AND THEY WOULD HAVE TO PAY EVERY YEAR THE  
23 COST TO TREAT THE WASTE FROM THOSE 6,000 HOMES.

24

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1    **SUP. ANTONOVICH, MAYOR:** WHAT ABOUT THE OTHER ISSUES THAT WERE  
2    RAISED?

3

4    **TOM LE BRUN:** I AM UNABLE TO TELL YOU BY MEMORY WHAT C.E.Q.A.  
5    COVERAGE THERE WAS IN 2002 WHEN THE AGREEMENT WAS PASSED. I  
6    JUST DO NOT HAVE THE ANSWER TO THAT. AND IN TERMS OF THE  
7    SPECIFIC COVERAGE IN THE NEWHALL SPECIFIC PLAN WITH THE  
8    ABILITY FOR THIS WASTEWATER TO TEMPORARILY GO TO THE VALENCIA  
9    PLANT, I AM UNAWARE OF THE DETAILS OF HOW THAT ISSUE'S COVERED  
10   IN THE NEWHALL RANCH SPECIFIC PLAN, THE E.I.R.

11

12   **SUP. ANTONOVICH, MAYOR:** COULD YOU ALSO REPORT TO THE BOARD ON  
13   THE POINTS THAT WERE RAISED AND THEIR TESTIMONY SO WE COULD  
14   HAVE THAT?

15

16   **TOM LE BRUN:** I'M SORRY, I DIDN'T HEAR YOU, SUPERVISOR.

17

18   **SUP. ANTONOVICH, MAYOR:** I WOULD LIKE YOU TO RESPOND TO THE  
19   BOARD IN A MEMO THE POINTS THAT WERE RAISED BY THE THREE  
20   SPEAKERS ON THIS ISSUE.

21

22   **TOM LE BRUN:** CERTAINLY.

23

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1    **LYNNE PLAMBECK:** MR. MAYOR, COULD YOU SPECIFICALLY ASK HIM TO  
2    RESPOND TO WHO IS GOING TO PAY FOR THE COST OF THE CHLORIDES  
3    IN THE WATER? BECAUSE THERE IS NO REVERSE OSMOSIS.

4

5    **SUP. ANTONOVICH, MAYOR:** THAT'S ONE OF THE QUESTIONS THAT YOU  
6    RAISED, AND THAT WILL BE INCLUDED IN THAT REPORT.

7

8    **LYNNE PLAMBECK:** THANK YOU VERY MUCH.

9

10   **SUP. ANTONOVICH, MAYOR:** OKAY, THANK YOU. THANK YOU, THANK YOU.  
11   SO MOVED. SECONDED BY SUPERVISOR RIDLEY-THOMAS. WITHOUT  
12   OBJECTION, SO ORDERED. ITEM NO. 5. DAVID CZAMANSKE, LAURIE  
13   GOULD, CAMRON STONE, GLEN OWENS, AND CAROL, YOU'LL FOLLOW  
14   AFTER THE FIRST SPEAKER, OKAY? THAT'S THE ARTICLE FROM THE  
15   "WALL STREET JOURNAL." SO THE FIVE OF YOU ARE STILL HERE,  
16   RIGHT? COME ON UP AND TAKE YOUR SEAT. OKAY. YOU CAN GO IN THE  
17   ORDER YOU WANT.

18

19   **LAURIE GOULD:** I'M SPEAKING TO THE ESTABLISH A WORKING GROUP  
20   WITH COMMUNITY REPRESENTATIVES TO PROVIDE INPUT TO THE LOS  
21   ANGELES --

22

23   **SUP. ANTONOVICH, MAYOR:** GIVE YOUR NAME FOR THE RECORD, FIRST  
24   SO THAT WE CAN IDENTIFY YOU.

25